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December 23, 2008

Linda Ketellapper, SFD-7-5
U.S. Environmental Protection Agency, Region IX
Superfund Division
75 Hawthorne Street
San Francisco, CA 94105

Re: Response to 104 (e) Request for Information - Omega Superfund Site
Real Property at 11862 Burke Street, Santa Fe Springs, California

Dear Ms. Ketellapper:

Enclosed find responses from Claudette A. Earl, an individual, regarding the
above-referenced matter.

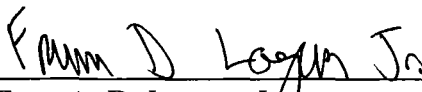
Please direct all future correspondence regarding Claudette A. Earl to the
following:

Francis D. Logan, Jr, Esq.
Law Offices of Susan M. Trager
19712 MacArthur Blvd., Suite 120
Irvine, CA 92612

Please feel free to call if you have any questions or concerns.

Sincerely,

LAW OFFICES OF SUSAN M. TRAGER
A Professional Corporation


Francis D. Logan, Jr.

FDL:ch

Enclosure

cc: Claudette A. Earl
Stephen Berninger

**QUESTIONS AND ANSWERS
FOR
CLAUDETTE EARL
CONCERNING
THE FACILITY LOCATED AT 11862 BURKE STREET,
SANTA FE SPRINGS, CA**

(Response to General Notice Letter, Omega Chemical Corporation Superfund Site)

DECEMBER 18, 2007 USEPA LETTER TO CLAUDETTE EARL:

1. Provide a written response on the status of all legal obligations you may have regarding your facility and all clean-up or other activities you are engaged in under the direction of federal, state or local authorities. The response should include a copy of all agreements and/or orders between you and other parties related to your facility and on-going activities and obligations.

The facility is currently under the environmental oversight of the Los Angeles Regional Water Quality Control Board (LARWQCB). Ms. Earl is currently working with LARWQCB to set up a Cost Reimbursement Account (CRA) to pay for LARWQCB's oversight. A copy of the CRA request is included herein at Tab 1.

A 1,000-gallon underground storage tank (UST) for Trim Sol was removed from the site in August 1997. Soil sample analysis during UST removal indicated the presence of perchloroethylene (PCE). Soil gas and soil sampling assessment done in November 1998 did not indicate elevated concentrations of PCE in soil vapor. Soil concentrations of PCE were below Environmental Protection Agency's (EPA) Preliminary Remediation Goal (PRG) for PCE for industrial sites.

In a letter dated August 8, 2000 (copy attached at Tab 2), LARWQCB required that further assessment be conducted to define the lateral and vertical extent of soil and groundwater contamination at the site. LARWQCB has been informed about the underlying operable unit 2 (OU2) groundwater plume of Omega superfund site in Whittier, CA. LARWQCB verbally indicated that a "soil only" case closure is possible after further site assessment is completed. Earl will pursue these directives as soon as the CRA is set up with LARWQCB.

Pages 3-11
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California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams.
Cal/EPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

August 4, 2008

Ms. Claudette Earl
Earl Manufacturing Co., Inc.

FOIA ex 6, Personal
Privacy

SITE CLEANUP PROGRAM OVERSIGHT COST REIMBURSEMENT ACCOUNT – EARL MANUFACTURING SITE, 11862 BURKE STREET, SANTA FE SPRINGS, CA (SLIC NO. 0725)

Dear Ms. Earl:

The California Regional Water Quality Control Board (Regional Board), Los Angeles Region, is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of the Los Angeles and Ventura Counties, including the referenced site.

Based on the information provided in subsurface investigation reports dating between September 1997 and December 1999, the subsurface soil and groundwater at the site have been impacted with volatile organic compounds (VOCs). Depth to groundwater was encountered in 1999 at approximately 28 feet below ground surface. Tetrachloroethene (PCE) has been detected in soil vapor at concentrations up to 21 micrograms per liter ($\mu\text{g/L}$), in soil matrix up to 422,000 micrograms per kilogram ($\mu\text{g/kg}$), and in groundwater up to 13,700 $\mu\text{g/L}$. The releases of chemicals from a former vapor degreaser and 1,000-gallon underground storage tank have degraded the groundwater quality and beneficial uses of the State's waters.

Section 13304 of the California Water Code (Porter Cologne Act) allows the Regional Board to recover reasonable expenses from a responsible party or parties for overseeing the investigation and cleanup of unregulated discharges adversely affecting the State's waters. In compliance with Section 13365 of the California Water Code, this letter is being sent to provide you the following information regarding costs for regulatory oversight work.

Estimate of Work to be Performed

The Regional Board staff estimates that during the Regional Board's 2008/2009 fiscal year (July 1, 2008 to June 30, 2009), regulatory oversight work may include but not limited to the following tasks to be performed at the site:

1. Review environmental reports and determine if the contamination sources and plumes are fully delineated vertically and laterally;
2. Request and review of additional assessment workplans and reports, detailed remediation design and installation plan, progress and monitoring reports, risk assessment workplans and reports, and other technical reports as necessary;
3. Preparation of comment letters on various reports and communicate findings to responsible parties;
4. Conduct site inspections, collect split samples, and meetings with environmental consultant and responsible parties; and
5. Conduct internal and external communications (i.e. meetings, memos) about the site.

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Statement of Expected Outcome

The expected outcome of work that will be performed includes providing written comments on the submitted reports and workplans, verifying the adequacy of reports, and determining the need to further investigate the impact to soil and groundwater as well as risk to human health and environment.

Billing Rates

Attached are the Site Cleanup Program, Monthly Salary Scales by Job Classification (Attachment 1) for employees expected to perform the work and the Reimbursement Process for Regulatory Oversight (Attachment 2). The names and classifications of employees that charge time to this site will be listed on the invoices. The average billing rate is about \$135.00 per hour. Recent salary adjustments will affect the current billing rates for many of our staff. An update billing rate may be included in a future quarter invoice for fiscal year 2008/2009.

Estimation of Expected Charges

- A. Regional Board staff expects to charge about 120 hours for work related to this site during fiscal years 2008/2009. Based on the average billing rate of \$135.00 per hour, the estimated billing charge by the Regional Board staff for this site during the current fiscal year is about \$16,200 which does not include possible contract charges stated in B (see below). **Please note that this is neither a commitment nor a contract for regulatory oversight. It is only an estimate of the work, which may be performed.**
- B. To better evaluate the potential health risk from the detected or residual contaminants posed to the current/future occupants of the site and the immediate site vicinity, the Regional Board has established a contract with the State Office of Environmental Health Hazard Assessment (OEHHA), to have their toxicologists review the submitted health risk assessment reports. OEHHA will review, evaluate if appropriate, and provide comments on risk assessment reports. When requested, OEHHA toxicologists will provide the Regional Board consultation services on issues concerning human health and/or environmental risks.

Under the Cost Recovery Program, the responsible party (parties) is (are) required to reimburse the Regional Board for the cost incurred by OEHHA review. Occurred charges by OEHHA staff will be included in our invoices under the contract charges category. All quarterly invoices generated for this project will be sent to your provided billing contact by the Site Cleanup Program (SCP), State Water Resources Control Board.

Landowner Notification and Participation Requirements

Pursuant to Division 7 of the Porter Cologne Water Quality Control Act under section 13307.1, the Regional Board is required to notify all current fee title holders for the subject site prior to considering corrective action or granting case closure. Therefore, you are required to provide the name, mailing address and telephone number for all record fee title holders for the site together with a copy of county record of current ownership, available from the County Recorder's Office, or complete the attached Certification Declaration Form (Attachment 3) and submit it to our office.

California Environmental Protection Agency



August 4, 2008

Please sign and return the enclosed landowner's information (Attachment 3) and "Acknowledgment of Receipt of Cost Reimbursement Account Letter" (Attachment 4) to Ms. Su Han of the Regional Board by **September 5, 2008**.

Other Requirements

I. Change of Ownership

You must notify the Executive Officer, in writing at least 30 days in advance of any proposed transfer of this cost reimbursement account's responsibility to a new owner containing a specific date for the transfer. In addition, you shall notify the succeeding owner of the existence of this cost reimbursement account by letter, copy of which shall be forwarded to the Board.

II. Public Participation


With increased public interest in our programs and the public knowledge of threat to human health and the environment, the Regional Boards are increasing our effort in getting the public more involved in our decision making process. The Regional Boards are also required to involve the public in site cleanup decisions under State law (including Health & Safety Code section 25356.1). You may be required to prepare and implement a public participation plan. Regional Board staff will provide you with additional guidance as appropriate.

III. Electronic Submittals

On April 27, 2005, the State Water Resources Control Board informed each responsible party of new regulations requiring the electronic submittal of information (ESI), which went into effect on January 1, 2005. The letter also stated that beginning on July 1, 2005, a paper copy of reports will no longer be required upon submittal of the electronic copy unless the Regional Board specifically requires the paper copy to be submitted (Attachment 5).

If you have any questions, please contact Su Han at (213) 576-6735 or shan@waterboards.ca.gov.

Sincerely,


Tracy J. Egoscue
Executive Officer

Chief Deputy E.O.

Cc: Mr. Dinesh Rao, Ami Adini Associates, Inc.

- Attachments:
1. Monthly Salary Scales by Job Classification
 2. Reimbursement Process for Regulatory Oversight
 3. Certification Declaration Form
 4. Acknowledgment of Receipt of Cost Reimbursement Account Letter
 5. New Regulations – Electronic Submittal of Information

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ATTACHMENT 1

SITE CLEANUP PROGRAM (SCP) BILLING COST EXPLANATION

Employee Salary and Benefits by Classification ¹ ABR		SALARY SCALE
Associate Governmental Program Analyst	AGPA	5,852 - 7,113
Engineering Geologist	EG	5,691 - 10,173
Environmental Scientist	ES	4,092 - 7,596
Office Assistant (G)	OA	2,758 - 3,684
Office Assictant (T)	OA	2,850 - 3,759
Office Technician (G)	OT	3,509 - 4,268
Office Technician (T)	OT	3,572 - 4,341
Principal Water Resources Control Engineer	PWRCE	13,090 - 14,434
Sanitary Engineering Associate	SEA	6,597 - 8,016
Sanitary Engineering Technician	SET	4,543 - 6,339
Senior Engineering, Water Resources	SWRCE	9,811 - 11,923
Senior Engineering Geologist	SEG	9,811 - 11,923
Senior Environmental Scientist	SRES	7,248 - 8,749
Staff Counsel	STCOUN	6,216 - 10,411
Staff Counsel III	STCOUNIII	10,217 - 12,606
Staff Counsel IV	STCOUNIV	11,286 - 13,934
Staff Environmental Scientist	SES	7,242 - 8,745
Student Assistant	SA	2,663 - 2,938
Student Assistant Engineer	SAE	2,663 - 3,985
Supervising Engineering Geologist	SUEG	10,769 - 13,090
Supervising Water Resources Control Engineer	SUWRCE	10,769 - 13,090
Water Resources Control Engineer	WRCE	7,883 - 10,131

Indirect Charges²

Indirect costs	100% of salaries and benefits
Accounting administrative costs	15% of salaries and benefits
Regional Board administrative costs	20% of salaries and benefits

Billing Example

Water Resources Control Engineer		
Salary:	\$	10,131
Overhead (indirect costs):	\$	10,131
Admin.: State Board	\$	1,520
Regional Board	\$	2,026
Total Cost per month	\$	23,808

Divided by 176 hours per month equals per hour: \$ 135.27

(Due to the various classifications that expend SLIC resources. An average of \$ 135.00 per hour can be used for projection purposes.)

¹ The name and classification of employees performing oversight work will be listed on the invoice you receive.

² The examples are estimates based on recent billings. Actual charges may be slightly higher or lower.

REIMBURSEMENT PROCESS FOR REGULATORY OVERSIGHT

We have identified your facility or property as requiring regulatory cleanup oversight. Pursuant to the Porter-Cologne Water Quality Control Act, reasonable costs for such oversight can be recovered by the Regional Water Quality Control Board (RWQCB) from the responsible party. The purpose of the enclosure is to explain the oversight billing process structure.

INTRODUCTION

The Porter-Cologne Water Quality Control Act authorizes the State Water Resources Control Board (SWRCB) to set up Cost Recovery Programs. The Budget Act of 1993 authorized the SWRCB to establish a Site Cleanups Program. The Cost Recovery Program is set up so that reasonable expenses incurred by the SWRCB and RWQCBs in overseeing cleanup of illegal discharges, contaminated properties, and other unregulated releases adversely impacting the State's waters can be reimbursed by the responsible party. Reasonable expenses will be billed to responsible parties and collected by the Fee Coordinator at the SWRCB in the Division of Clean Water Programs (DCWP).

THE BILLING SYSTEM

Each cost recovery account has a unique charge number assigned to it. Whenever any oversight work is done, the hours are billed to account number on the employee's time sheet. The cost of the staff hours is calculated by the State Accounting System based on the employee's salary and benefit rate and the SWRCB overhead rate.

SWRCB and RWQCB Administrative charges for work such as accounting, billing preparation, general program meetings and program specific training cannot be charged directly to an account. This work will be charged to Administrative accounting codes. The Accounting Office totals these administrative charges for the billing period and distributes them back to all of the accounts *based on the number of hours charged* to each account during that billing period. These charges show as SWRCB Program Administrative Charges and RWQCB Program Administrative Charges on the Invoice.

The Overhead Charges are based on the number of labor hours charged to the account. The overhead charges consist of rent, utilities, travel, supplies, training, and accounting services. Most of these charges are paid in arrears. Therefore, if there is no labor charged during the billing period, there still may be overhead charges associated with previous months services. The Accounting Office keeps track of these charges and distributes them back monthly to all of the accounts based on the number of hours charged to each account. Therefore, the quarterly statements could show no labor hours charged for that billing period, but some overhead costs could be charged to the account.

Invoices are issued quarterly, one quarter in arrears. If a balance is owed, a check is to be remitted to the SWRCB with the invoice remittance stub within 30 days after receipt of the invoice. The Accounting Office sends a report of payments to the Fee Coordinator on a quarterly basis.

Copies of the invoices will be sent to the appropriate RWQCBs so they are aware of the oversight work invoiced. Questions regarding the work performed should be directed toward your RWQCB case worker.

ATTACHMENT 2

If the responsible party becomes delinquent in their quarterly payments, oversight work will cease immediately. Work will not begin again unless the payments are brought up-to-date.

DISPUTE RESOLUTION

If a dispute regarding oversight charges cannot be resolved with the RWQCB, Section 13320 of the California Water Code provides a process whereby persons may petition the SWRCB for review of RWQCB decisions. Regulations implementing Water Code Section 13320 are found in the Title 23 of the California Code of Regulations, Section 2050.

DAILY LOGS

A detailed description (daily log) of the actual work being done at each specific site is kept by each employee in the Regional Water Board who works on the cleanup oversight at the property. This information is provided on the quarterly invoice using standardized work activity codes to describe the work performed. *Upon request, a more detailed description of the work performed is available from the RWQCB staff.*

REMOVAL FROM THE BILLING SYSTEM

After the cleanup is complete, the RWQCB will submit a closure form to the SWRCB to close the account. If a balance is due, the Fee Coordinator will send a final billing for the balance owed. The responsible party should then submit a check to the Accounting Office to close the account.

AGREEMENT

No cleanup oversight will be performed unless the responsible party of the property has agreed in writing to reimburse the State for appropriate cleanup oversight costs. You may wish to consult an attorney in this matter. As soon as the letter is received, the account will be added to the active Site Cleanup program Cost Recovery billing list and oversight work will begin.



California Regional Water Quality Control Board

Los Angeles Region



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Linda S. Adams.
Cal/EPA Secretary

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Arnold Schwarzenegger
Governor

ATTACHMENT 3

CERTIFICATION DECLARATION FOR COMPLIANCE WITH FEE TITLE HOLDER NOTIFICATION REQUIREMENTS (California Water Code Section 13307.1)

Please Print or Type

Fee Title Holder(s): _____

Mailing Address: _____

Contact Person: _____

Telephone Number / Fax Number: _____

Site Name: _____

Address: _____

County Assessor Identification (Parcel) Number (AIN): _____

Contact Person: _____

Telephone Number / Fax Number: _____

File Number: _____ SLIC No. 0725

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." (See attached page for who shall sign the Certification Declaration).

Printed Name of Person Signing

Official Title

Signature

Date Signed

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The certification declaration form must be signed as follows:

1. For a corporation - by a responsible corporate officer, which means; (i) by a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy of decision making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million, if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
2. For a partnership or sole proprietorship - by a general partner or the proprietor respectively.
3. For a municipality, state, federal, or public agency - by either a principal executive officer or ranking elected official. A principal executive officer of a federal agency includes (i) the chief executive officer of the agency or (ii) a senior executive officer having responsibility for the overall operations or a principal geographic unit.



California Regional Water Quality Control Board Los Angeles Region



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Governor

ATTACHMENT 4

ACKNOWLEDGEMENT OF RECEIPT OF OVERSIGHT COST REIMBURSEMENT ACCOUNT LETTER

I, _____, acting within the authority vested in me as an authorized representative of _____, a corporation, acknowledge that I have received and read a copy of the attached **August 1, 2008** letter concerning cost reimbursement for Regional Board staff costs involved with oversight of cleanup and abatement efforts at **Earl Manufacturing Site in Los Angeles County**. The address for the site is 11862 Burke Street, Santa Fe Springs, and its Los Angeles County Assessor's Identification (formerly called Parcel) Number is _____.

I understand the reimbursement process and billing procedures as explained in the letter. Our company is willing to participate in the cost recovery program and pay all subsequent billings in accordance with the terms in your letter and its attachments, *and to the extent required by law*. I also understand that signing this form does not constitute any admission of liability, but rather only an intent to pay for costs associated with oversight, *as set forth above, and to the extent required by law*. Billings for payment of oversight costs should be mailed to the following individual and address:

BILLING CONTACT _____

BILLING ADDRESS _____

TELEPHONE NO. _____ **FAX NO.** _____

RESPONSIBLE PARTY'S SIGNATURE _____ (Signature)

_____ (Title)

DATE: _____

SLIC NO. 0725

SITE ID NO.

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California Regional Water Quality Control Board

Los Angeles Region



Alan C. Lloyd, Ph.D.
Agency Secretary

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ATTACHMENT 5

July 1, 2005

Notice to Interested Parties

NEW REGULATIONS - ELECTRONIC SUBMITTAL OF INFORMATION

The State Water Resources Control Board (State Water Board) recently adopted regulations requiring the electronic submittal of information (ESI), over the internet, for cleanup programs overseen by the California Regional Water Quality Control Boards (Regional Water Boards), starting January 1, 2005.

Parties responsible for cleanup of pollution at sites overseen by the Regional Water Board's Department of Defense (DoD), Spills, Leaks, Investigations, and Cleanups Program (SLIC), and Land Disposal Programs are required to submit over the internet, the following information electronically:

- groundwater analytical data,
- surveyed locations of monitoring wells,
- boring logs describing monitoring well construction, and,
- portable data format (PDF) copies of all reports.

The text of the regulations is attached, and can be found at the following URL:

http://www.waterboards.ca.gov/ust/cleanup/electronic_reporting/docs/final_electronic_regs_dec04.pdf

The State Water Board GeoTracker data management system is capable of accepting this electronic information. GeoTracker is a geographic information system providing online access to environmental and regulatory data. Currently, Geotracker has information submitted by responsible parties for over 10,000 Leaking Underground Storage Tank sites statewide. This information is available to the public at:

<http://www.geotracker.swrcb.ca.gov>

Beginning July 1, 2005, a paper copy of reports will no longer be required for the DoD, SLIC, or Land Disposal Programs upon submittal of the electronic copy unless the Regional Water Board specifically requires the paper copy to be submitted. The electronic reports are intended to replace the need for a paper report, and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

The Regional Water Board does not have the resources to acquire hardware to allow caseworkers to appropriately review documents in electronic form. Therefore, for the foreseeable future, we request that you continue to submit hard copies of all documents and data submittals.

You will need a GeoTracker password for submitting data and reports. To obtain instructions for receiving a GeoTracker password please go to our ESI website:

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http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting/index.html

Our ESI website has an on-line tutorial to aid your transition to electronic data and reporting submittal. You can access information on how to upload electronic data at the following ESI website:

http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting/docs/ab2886_primer.pdf

If you have any questions or need additional information on reporting electronic data, please contact Hamid Foolad at: hfoolad@waterboards.ca.gov.

Training and Outreach

User outreach meetings will be arranged in both Northern and Southern California based upon demand. The GeoTracker system will be announcing future sessions to all regulators, consultants and responsible parties who hold a GeoTracker password.





Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board Los Angeles Region

(50 Years Serving Coastal Los Angeles and Ventura Counties)

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Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: <http://www.swrcb.ca.gov/rwqcb4>



Gray Davis
Governor

August 8, 2000

Claudette Earl
Earl Manufacturing
11876 E. Burke Street
Santa Fe Springs, CA 90670

**EARL MANUFACTURING—11862 BURKE STREET, SANTA FE SPRINGS
(FILE NO. 00-026, SLIC NO. 752)**

Dear Ms. Earl:

Our previous letter dated February 14, 2000, requested that you submit a site audit report and a work plan for additional soil investigation. On April 7, 2000, Board staff conducted an inspection of the above facility and was informed by your consultant, Mr. Richard Winstanley, that additional reports regarding soil and groundwater investigation were available. During the inspection, Board staff requested that you not submit the work plan for additional soil investigation until the site audit report and the other reports had been submitted and reviewed by Board staff.

We have received copies of the site audit report, dated April 27, 2000, and the following additional reports:

- "Underground Storage Tank Removal" dated September 12, 1997, United Pacific Environmental.
- "Soil Gas and Limited Soil Sampling Report" dated December 1998, SCS Engineers.
- "Summary of Groundwater Monitoring Activities" dated December 8, 1999, SCS Engineers.

We have completed our review of the information listed above and have the following comments:

- Earl Manufacturing previously operated a vapor degreaser and used 1,1,1-trichloroethane.
- On August 13, 1997, a 1,000-gallon underground storage tank (UST) was removed from the site.
- Soil samples collected from beneath the UST were found to contain perchloroethene (PCE) at 422,000 µg/kg.
- On November 13, 1998, SCS Engineers conducted additional soil investigation by collecting 10 soil gas samples at and around the former UST location and two soil samples beneath the former UST location.

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- Soil samples collected at 11.5 and 20 feet BGS, below the former location of the UST, were found to contain perchloroethene (PCE) at 270 micrograms per kilogram ($\mu\text{g/kg}$) and 950 $\mu\text{g/kg}$, respectively. SCS Engineers recommended that no further investigation or remediation was warranted.
- On about November 11, 1999, SCS Engineers installed a groundwater monitoring well at the location of the former UST.
- PCE, trichloroethene (TCE), and cis1,2-dichloroethene were detected in groundwater at 13,700 $\mu\text{g/L}$, 1,730 $\mu\text{g/L}$ and 6.3 $\mu\text{g/L}$, respectively.
- Soils beneath the former UST consist of medium brown slightly moist clayey silt.

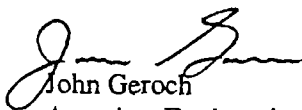
Based upon the information contained in these reports, we have determined that the previous chemical use at this facility has resulted in soil and groundwater contamination, but the full lateral and vertical extent of soil and groundwater contamination has not been adequately defined.

Therefore, Earl Manufacturing is required to:

1. Investigate the potential for soil contamination beneath the former vapor degreaser.
2. Determine site-specific soil remedial goals for soils contaminated with VOCs in accordance with the Regional Board's "Interim Site Assessment and Cleanup Guidebook.
3. Submit a work plan to investigate the soils beneath the former vapor degreaser, determine the vertical and horizontal extent of contamination beneath the former UST, and investigate the lateral and vertical extent of groundwater contamination.
4. Develop a remedial action plan for soils beneath the former UST.

Please submit two copies a work plan incorporating the requirements listed in items one through four above by September 1, 2000. Please call me at (213) 576-6737 if you have any questions.

Sincerely,



John Geroch
Associate Engineering Geologist
Site Cleanup Unit

Cc Dave Klunk, Director of Environmental Services, City of Santa Fe Springs
Brenda Nelson, City of Santa Fe Springs Fire Department
Craig Cooper, United States Environmental Protection Agency
Jim Leserman, Water Replenishment District of Southern California
Lori Parnass, Department of Toxic Substances Control

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